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Divorce—Habitual Drunkenness.—A person who has the fixed habit of frequently getting drunk is held, in *Page v. Page* (Wash.) 6 L.R.A.(N.S.) 914, to be an habitual drunkard within the meaning of the divorce laws, although he has more sober than drunken hours, and the habit does not incapacitate him from performing, during the working hours of the day, ordinary, unskilled, manual labor.

Census Returns as Evidence of Age.—The absence of official birth records in this country generally often makes it difficult to prove a person's age in our courts. Evidence of varying nature is relied on to supply this want of official records. In *Priddy v. Boyce*, 99 Southwestern Reporter, 1055, the Missouri Supreme Court gives its sanction to the use of properly certified copies of the United States census for this purpose.

Religious Faith of Adopted Child.—The right of a mother to have her child brought up by foster parents in her religious faith is considered to be true as a general proposition by the Supreme Judicial Court of Massachusetts in *Puirton v. Jamrock*, 80 Northeastern Reporter, 802, but if the wishes of the mother with reference to the religious faith of the child cannot be carried into effect without sacrificing what the court seems to be for the welfare of the child, they must so far be disregarded. The court will not of itself prefer one church to another, but will act without bias for the welfare of the child under the circumstances of each case.

Automobile Races.—A spectator at an automobile race illegally conducted on a city street, who is injured by an automobile swerving in its course and leaving the street, is not precluded from recovering for his injury because he knew the race was illegally conducted, according to the decision of New York Court of Appeals in *Johnson v. City of New York*, 78 Northeastern Reporter, 715; but the injured spectator cannot recover merely on the ground of the illegality of the contest. He must prove negligence on the part of defendant. See *Canlong v. Wedger*, 156 Massachusetts, 462, 31 Northeastern Reporter, 642, and *Frost v. Josselyn*, 180 Massachusetts, 389, 62 Northeastern Reporter, 469.

Amount of Change to Be Carried by Street Car Conductor.—Passengers about to board street cars who have only bills of large denominations must take care to have them changed before tendering payment for their car fare, according to the decision of the Tennessee Supreme Court in *Knoxville Traction Company v. Wilkeson*, 99 Southwestern Reporter, 992, wherein it was held that a rule of a company fixing \$5 as the limit on the amount of change it will undertake to furnish passengers is reasonable.